ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0023728

I. GENERAL INFORMATION

Facility: Naselle Youth Camp
11 Youth Camp Lane
Naselle, WA 98638

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on March 19, 2001, and accepted by the Department on April 2, 2001. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for Naselle Youth Camp was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Naselle Youth Camp for the discharge of wastewater to Naselle River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1997. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts are persuasive enough to undertake a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on February 21, 1997.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were left unchanged. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

IV. PREVIOUS PERMIT COMPLIANCE

S9. OUTFALL EVALUATION

> The Permittee shall inspect the submerged portion of the outfall line and diffuser port to document its integrity and continued function. The inspection report shall be submitted to the Department six months prior to permit expiration. If conditions allow for a photographic verification, it shall be included in the report.

The Permittee has completed this condition.

V. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on October 11, 2000, and October 18, 2000, in *Chinook Observer* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department published a Public Notice of Draft (PNOD) on May 2, 2001, in *Chinook Observer* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6279, or by writing to the address listed above.

RESPONSE TO COMMENTS

The fact sheet (p.5) states that the previous permit for this facility was issued on January 5, 1981. The second sentence after that says that Ecology accepted the NPDES permit application as complete during October 1996. I did receive a draft permit for the Naselle Youth Camp WWTP in November of 1996 and assumed that it was subsequently issued. When was the existing permit issued for this WWTP?

The existing permit was issued February 21, 1997.

The 1981 permit includes daily monitoring requirements for chlorine residual testing. There is no mention of chlorine residual testing or a description of the disinfection system that I noticed in the proposed permit or fact sheet. What is the method of disinfection at this facility, and what O&M measures are utilized to ensure that it is consistently operational?

The method of disinfection is UV. The O&M procedures for the UV system are contained in the O&M Manual for the facility. UV systems require periodic cleaning and replacement of the UV lamps.

The fact sheet states (p.4) that the terminus of the outfall is exposed during low tidal conditions. What guidance or assumptions does Ecology use to allocate an acute mixing zone to such outfalls?

There is no specific guidance to cover this situation. This is an area of best engineering judgement. The mixing zone was authorized according to 173-201A WAC. According to the mixing zone study by Cosmopolitan Engineering Group, there is adequate mixing within the acute and chronic mixing zones to meet water quality standards with technology-based limits. Since the receiving water depth is very shallow, the effluent plume will be vertically mixed instantaneously. All of the mixing will occur because of lateral spreading in a horizontal plane. The depth of the diffuser pipe, whether submerged or not, becomes irrelevant to the actual mixing that occurs.

The wastewater characterization in Table 1 of the fact sheet provides a value of 200 FC/100 ml. Is this the highest weekly fecal coliform value from this facility over the past several years?

From January 1, 1998, to January 1, 2001, it looks like the highest GM7 data point is 116 colonies/100 mL.